

## **FY 2004 Public Housing Agency 5-Year and Annual Plans**

### **Responses to Comments from the Resident Advisory Board and Public Hearing**

#### **Comments from the Resident Advisory Board**

##### **Section 2: Financial Resources**

Since there is no PHDEP grant, the RAB recommends that HCDCH continue to allocate money (approximately \$500,000) for crime and drug prevention activities from the Operating Subsidy. This will ensure that RSS has resources to continue programs and services like working with the tenant patrols and funding drug prevention programs.

*Response: HCDCH will continue to support drug prevention programs and the tenant patrols within the funding constraints of the Operating Subsidy. HCDCH is also committed to continue collaboration with the Police Departments to support tenant patrols with training and walks.*

The RAB recommends that HCDCH provide the RAB a budget outside of the Resident Services Section. This will empower the RAB to make more decisions independently from HCDCH.

*Response: The HCDCH will continue to provide resources for the effective functioning of the Resident Advisory Board and will continue to support the Resident Advisory Board through the Resident Services Section.*

##### **Section 3: PHA Policies Governing Eligibility, Selection, and Admissions**

The RAB recommends that the HCDCH keep the preference for homelessness as a priority. But HCDCH should also provide a definition for homelessness to avoid the situation where people claiming to be homeless, go to IHS for the night, and get to move up on the wait list and which takes into account those who are homeless due to circumstances beyond their control. The policy should also be sure that it checks the homeless status of both heads of households to avoid allowing people who were kicked out of public housing to be allowed back in under another family member's name.

*Response: HCDCH agrees that there should be a preference for homeless. However, HCDCH staff is currently reviewing all preferences identified in the 2004 PHA Plan to determine the short and long term impact of each preference as it will affect current and future housing applicants, housing vacancy rates, HUD rules and standards, financial, and management issues. It is hoped that a determination can be made during the development phase of the FY 2005 PHA Annual Plan.*

The RAB recommends that HCDCH ensure that Managers are implementing programs consistently across all management units. For example, why have some projects not implemented the Community Service Requirement yet? This will help ensure that all residents are treated fairly and reduces mistrust of managers.

*Response: HCDCH agrees. To ensure the consistent and equitable implementation of HUD mandated requirements, HCDCH will be developing standard operating and implementing procedures as well as training each manager on the established policies and procedures.*

#### **Section 4: Rent Determination Policies**

The RAB recommends that HCDCH continue to provide information to residents on the hardship rent exemption policies at the time of annual re-exam and through regular flyers, newsletters, and the monthly rent statement. HCDCH should work to educate resident associations on the hardship exemption so that they can also help improve communication and inform their communities. Finally, HCDCH should establish a committee which includes residents to determine whether there are any discretionary policies that should be established.

*Response: HCDCH will continue to make every effort to educate current residents on the exemption policy. With our renewed emphasis on resident councils, HCDCH will provide the resident leaders with the exemption information and ask them to pass on the information to their residents. The resident councils are tasked with determining ways to communicate with their residents. It is hoped that through this renewed relationship with the resident leadership a cooperative and sharing communication channel will be opened. We hope other housing issues and policies can be discussed through this new resident dialogue.*

#### **Section 5: Operations and Management Policies**

No recommendations.

#### **Section 6: Grievance Procedures**

The RAB recommends that the HCDCH write the grievance procedures in plain and various language for use by the residents. This will help ensure that all residents understand the procedures. A simple step-by-step guide to accompany the current procedures would be more helpful and useful for residents.

*Response: HCDCH will make every effort to ensure that residents are provided the grievance procedures in various foreign languages or have a foreign language interpreter review the grievance procedures with the resident(s), as requested by the resident(s). The staff will review current written guidelines in order to develop a resident-friendly document.*

#### **Section 7: Capital Improvement Needs**

The RAB commented that the HCDCH always asks for funds first then talks to the RAB. The RAB recommends that HCDCH get input from residents regarding capital improvement needs even before projects are selected for renovations. This way residents are part of the planning process from the beginning rather than just a “rubber stamp” after projects are chosen.

*Response: Resident participation is currently an integral part of the planning process as stated in 24 CFR 968.315(b) subparagraphs (1) and (2). Resident surveys are used to help determine project priorities.*

The RAB recommends that HCDCH establish a committee that would include a resident representative who has resided at the project at least 2 years to provide suggestions during the design phase and conduct inspections during construction. This way residents are part of the planning process from the beginning and can double check whether their suggestions were implemented.

*Response: Through their resident councils, residents may provide input into the design of selected projects. HCDCH will have the final authority on the design of the project, which is based on such matters as budget, scope of work, social and physical environments, etc. Resident inspections during construction would not be possible due to safety and contractual factors.*

The RAB recommends that HCDCH train residents to sit on a selection committee for contractors and consultants. Residents should be part of the planning process from the beginning and have input.

*Response: The procurement of the consultants and contractors is the responsibility of HCDCH. Consultants are selected by a panel comprised of one representative from HCDCH and the remaining panelists from other governmental agencies or the private sector. Every potential panelist must have sufficient education, training, and licenses or credentials in order to evaluate any proposal. In addition, the selection of contractors is conducted based on a "Low-Bid Procurement System."*

The RAB recommends that HCDCH create a system to update residents on construction activities and provide progress reports. For example, when there is a delay in construction such as at Waimaha, residents are not told what is going on and when they can expect to move back in a timely manner. Also, HCDCH should find a way to keep contractors who do a bad job from getting future jobs.

*Response: HCDCH will work with the resident councils to provide timely progress reports to residents.*

## **Section 8: Demolition and Disposition**

No recommendations.

## **Section 9: Designation of Housing**

The RAB does not support the segregation of physically disabled people from family projects. Those with disabilities should be allowed to choose where they want to live just like any other family.

The RAB supports the designation of elderly housing just for elderly people. Sometimes the mentally disabled people cause problems for the elderly and they do not feel safe in their projects. The RAB recommends that HCDCH consider having some projects that

are just for elderly people. However, elderly people should also be allowed to live in family projects if they choose – some would like to be near their children and friends.

*Response: HCDCH intends to explore the option of designation of housing for both the elderly and disabled. In order for HCDCH to request HUD approval for designation of housing, a designated housing plan must be developed. Should HCDCH request HUD's approval for designation of housing, both the elderly and the disabled must be allowed a choice on where they want to live, i.e. family project vs. housing designated for elderly or disabled.*

## **Section 10: Conversions of Public Housing**

No recommendations.

## **Section 11: Homeownership**

No recommendations.

## **Section 12: Community Service Programs**

The RAB recommends that HCDCH provide deprogrammed units or reasonable and adequate office space for resident association activities. This will help associations to conduct official association business and ensure that HCDCH comply with the requirements of 24 CFR 964 regarding resident participation.

*Response: HCDCH concurs that recognized resident councils should be provided with reasonable office space. HCDCH is currently working with HUD to draft an official policy on the deprogramming of housing units for non-dwelling purposes (such as for use by resident councils) to ensure compliance with federal regulations. Requests for a deprogrammed unit will be considered on a case-by-case basis and based on criteria such as council goals, access to other community facilities, and project size.*

The RAB recommends that HCDCH continue the FSS program for families in section 8. It is a wonderful program and residents who are in the program are receiving much benefit from the case management plan. The RAB also recommends that HCDCH expand the public housing FSS program for more participants to take advantage of the program's benefits.

*Response: HCDCH concurs that the Family Self Sufficiency Program provides wonderful benefits to program participants and is committed to providing the program for both Section 8 and Public Housing residents.*

## **Section 13: Crime and Safety**

The RAB recommends that HCDCH establish a system for Managers to follow-up on reports of crime from HPD or residents. This system would provide follow-up to residents so that they know what action was taken in response to their report or complaint.

*Response: When crime activities occur within any project, it is HCDCH's intent to keep residents informed of the status of the investigation. HCDCH recognizes that management and residents must work hand in hand and communicate among themselves to ensure a safe and healthy living environment. However, there are situations where the police have asked that information not be shared to prevent jeopardizing any ongoing investigations. Also, there are situations that information is not shared to protect residents' privacy. HCDCH will make every effort to work with residents, resident councils, and the police to eliminate crime within our projects.*

#### **Attachment E: Community Service Requirement**

The RAB recommends that HCDCH work with resident associations to create programs such as the Neighbor to Neighbor Care program.

*Response: HCDCH is committed to working with resident councils to establish programs that help build healthy communities.*

The RAB recommends that HCDCH change the name of the Community Service Program to be more positive like the "Up-lift program" or to think of a Hawaiian name for the program like the one used for the Tenant Patrol Conference. A more positive name would help create a more positive feeling when residents participate in the program.

*Response: HCDCH is willing to consider suggested names for the Community Service Program as long as it does not create confusion for the residents who are already participating in the program.*

The RAB recommends that HCDCH hire a third party to implement the Community Service Requirement. The RAB feels this will help ensure that the program is applied consistently and fairly across all projects. Also, the third party could provide referrals for volunteer activities and training programs to residents.

*Response: HCDCH is exploring the option of contracting a third party to assist in the continued implementation the Community Service Requirement, subject to the availability of funds and capacity of community organizations or service providers to manage a statewide program. HCDCH is also exploring ways to create linkages between volunteer and employment opportunities for those residents required to perform eight hours of community service.*

#### **Attachment F: Pet Policy**

The RAB recommends that HCDCH implement the Pet Policy across all management units. Some projects are currently allowing pets and others are not and this is creating conflict between residents and their managers.

*Response: Every federal public housing project manager is aware that residents are allowed to have pets as long as the policies and procedures are followed as outlined in HCDCH's Pet Policy. Residents who have questions or concerns about the implementation of the pet policy should contact their project manager for assistance.*

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## COMMENTS FROM RESIDENTS AND GENERAL PUBLIC:

### General Comment:

To reallocate limited financial support, labor, equipment, materials, supplies and other resources to focus on, address, abate, and finally resolve agency-wide health and safety issues – serious issues that were not given due priority attention and left unresolved because necessary actions were left undone because of the lack of direction by past HCDCH administrators.

*Response: HCDCH agrees that all health and safety issues must be addressed as a priority. HCDCH is currently developing a plan to address all deficiencies identified in an inspection completed by a contractor hired by HUD in 2003. Once the plan is completed, funding and resources will be addressed.*

While HCDCH works directly with the RAB in developing various policies, there is inconsistent implementation and application of those policies at the management unit level. HCDCH needs to develop administrative rules for applying the policies. There are no standards for managers to operate by. They have their own power of discretion, but there should be a standard to what and how things are implemented. An example of this is the implementation of the pet policy. It has become more of a monster than an opportunity because of lack of standards.

*Response: HCDCH agrees that more can be done to ensure equal and uniform implementation of policies and rules within the property management branch. Household pets are addressed in §15-190-91, Pet Ownership. However, a more detailed implementation and maintenance plan is being developed to provide each unit manager with a set standard and procedures to follow. This initiative is also being undertaken in the implementation of the Community Service Requirement.*

Communications within HCDCH is a problem. Residents are confused on who to contact in terms of the resident associations. Unit management should be supporting the associations while the Resident Services Section should be the ones who work with the associations. There are too many people involved and are passed from one section to another.

*Response: HCDCH agrees. However, the responsibility of assisting in the formation of resident associations lies with the Resident Services Section (RSS), but the unit manager plays an essential part of assisting RSS and the resident associations. The manager is the one entirely responsible for the daily operations of the housing project and must be aware of all resident activities within his/her project. There should be a triangle of communication between the unit manager, RSS, and the resident association. HCDCH's goal is to create a wholesome, cooperative atmosphere in every single housing project, which results in a safe and healthy environment for both the residents and employees of HCDCH.*

HCDCH needs to hire a Property Management and Maintenance Branch supervisor. There is no one person residents can contact to have their questions or concerns answered. The residents are losing out.

*Response: HCDCH agrees that the Property Management and Maintenance Branch supervisor is a critical position that has to be filled. The hiring process requires various approvals and not all approvals have been received to date.*

HCDCH needs to work on collaborating more with the RAB. Residents are partners with HCDCH and agree and disagree on many issues, but residents want to work as one especially on a bill to streamline evictions. The RAB was not asked for their input.

*Response: HCDCH will continue to work in facilitating discussion on legislation with residents. Also, HCDCH will continue to consult with the RAB when legislation is needed to support the implementation of the PHA Plan.*

There are so many problems with recognizing resident associations. The reason to that are no approved administration rules and questions on what is a resident in good standing. The definition varies within HCDCH's management units.

*Response: HCDCH requires that the following conditions be met by a resident to be considered in compliance with the lease and eligible to seek office on a resident council's governing board and to continue to hold an elected position:*

- a. Not owe any back rent or have any debts owing the HCDCH that is more than 5 days in arrears. This excludes tenants who are on an approved written payment plan with HCDCH as arranged through the project's management office to cure any debts or delinquencies.*
- b. Not be in the eviction process or have been referred for eviction due to any lease violation.*
- c. Not be in violation of any of the following lease conditions:*
  - 1. Failing to report changes in family income, assets, and employment and household composition as required by Management to determine Tenant's rental rate and eligibility for continued occupancy; changes shall be reported within ten business days;*
  - 2. Shall not engage in any criminal activity or alcohol use that threatens the health, safety or right to peaceful enjoyment of HCDCH's public housing premises by other public housing residents or neighboring residents of employees of Management;*
  - 3. Shall not engage in any drug-related criminal activity on or off the project premises;*
  - 4. Shall not keep or permit to be kept any animal as a pet or otherwise in or about the dwelling unit except in accordance with the Pet Policy;*

5. *Shall comply with all HUD and HCDCH regulations pertaining to the requirement that all adult household members, unless exempt, participate for at least eight hours per month in community service.*

*For any of the conditions listed above, the tenant shall have been notified in writing of the specific lease violation by the Management office. If there is a conflict between this policy and any HUD policy and guidance, the HUD policy and guidance shall prevail.*

Revise the definition of “family” located at page 15-10 of the Admissions and Continued Occupancy Policy to conform to the definition contained in the Hawaii Administrative Rules.

*Response: HCDCH agrees and changes will be made to the ACOP to conform to the HAR.*

There was no notification of the hearing for residents at Nani Olu until March 15, 2004. In addition, the plans were not available at Ka Hale Kahaluu. There was also insufficient time to review and provide comments before the March 22, 2004 deadline. Residents have not been able to discuss the plans because of the delay in notification and obtaining a copy of the plans. It is recommended that another hearing be conducted so residents can provide comments to the plans. HCDCH has not conducted out reach activities to promote participation in the public hearing and this has not been done. The same comment was made by other housing project residents in Kona.

*Response: Notification of the public hearings for the FY 2004 PHA Plan was accomplished by publishing a notice in the various island newspapers. These notices were published beginning on February 9, 2004. In addition, copies of the plans were sent to each RAB member, every federal public housing management unit, local libraries, and posted on the HCDCH Internet website. It is not known why Management Unit 43 did not have copies of the PHA Plan available for public viewing. In the future, each management unit manager will be required to sign for the PHA Plans and along with detail instructions on the disposition of the plans. It is not possible to hold another hearing and meet the deadline established by HUD (April 15) and not jeopardize any HUD funding. HCDCH will continue to ask the members of the RAB to communicate the results of the numerous discussions that are held with HCDCH staff on the PHA Plans with their housing communities. HCDCH will also begin communicating more with the leadership of the resident associations on matter dealing with the plans.*

A resident at the Kona hearing stated that there should have been a hearing held on Molokai and not just Maui.

*Response: HCDCH will consider including Molokai as a hearing site for the FY 2005 PHA 5-Year and Annual Plans in 2005.*

**5-Year Plan – HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals**



The box that states, “Provide and attract supportive services to increase independence for the elderly and families with disabilities” is not checked. This box should be checked and not leave out the elderly and families with disabilities.

*Response: HCDCH agrees and has checked the box. HCDCH secured competitive HUD funding for the elderly and persons living with disabilities for programs that began in 2003 and 2004. HCDCH will continue to seek to provide supportive services to increase independence for the elderly and families with disabilities.*

Do not agree with implementing measures to deconcentrate projects by bringing in higher income families into lower income projects especially those that do not pay rent (2 police officers are residing in Lanakila and not paying rent).

*Response: Every PHA is required by 24 CFR 903, Subpart A to illustrate how it provides for the mandated deconcentration of poverty and income mixing in certain public housing developments and to affirmatively further fair housing in admissions. At Attachment K is the required deconcentration analysis that must be conducted. Of the eighteen identified housing projects meeting the HUD average income range, only eight have been identified requiring deconcentration. The remaining ten projects are exempt due to area median income levels, being an elderly project, or scheduled for modernization. A program that HCDCH wholeheartedly supports is the housing of law enforcement officers in our housing projects. 24 CFR 906.505 allows a PHA to house full-time, duly licensed professional police officers by a Federal, State or local government or by any agency of these governments who would not otherwise be eligible for occupancy to reside in public housing for increased security. Rent may be waived in exchange for services rendered, i.e. security at the project site. This has been included in the PHA Plan in Component 13. PHA Safety and Crime Prevention Measures.*

Programs such a Hula Mae, Mortgage Credit Certificate, and State Rent Supplement are not fully understood or used in Hilo. There should be more done to advertise the programs and make them more available to residents in Hilo.

*Response: The Hula Mae and Mortgage Credit Certificate programs are designed for homeownership through participating lenders and are not to be used in conjunction with federal public housing funds. The participating lenders promote their programs to their potential clients. Qualified public housing resident can utilize these programs in pursuing homeownership. HCDCH website at <http://www.hcdch.hawaii.gov> provides a list of participating lenders and information on these homeownership related programs. The State Rent Supplement Program is designed to assist state residents in the lower income levels in paying their rents. However, residents currently receiving assistance from the Department of Human Services or are living in HCDCH subsidized housing do not qualify for this program.*

## **Section 1: Statement of Housing Needs**

It continues to be very difficult for Section 8 voucher holders to actually locate a landlord willing to rent to them/accept Section 8. Although the strategies listed are good, they still will not resolve this problem. The lack of landlords impacts on the section 8 lease up rates and makes it difficult for the PHA to achieve a goal of 90-95% lease up in order to

enable the maximum number of people to use Section 8 in our very tight rental market. One other strategy to ameliorate this problem would be project basing of Section 8 vouchers, especially if the vouchers could be target to people at 30% of AMI in the projects that apply for project based Section 8.

*Response: HCDCH agree and has checked the “Other” box under “Strategy 1. Maximize the number of affordable units available to the PHA within it current resources” and indicates that HCDCH will evaluate the potential use of Section 8 vouchers in support of Section 8 project based housing scheme. In addition, the “Other” box has been checked under, “Strategy 2: Conduct activities to affirmatively further fair housing and indicated that HCDCH will evaluate the use of vouchers in a Section 8 project based plan.*

### **Section 3: PHA Policies Governing Eligibility, Selection, and Admissions**

HCDCH needs to review its current admissions preferences especially those given high priority such as the homeless, involuntary displacement, victims of domestic violence in terms of the large number on the waiting lists. HCDCH needs to clean up and looking at the priority and give those working poor who stay on the list while those with a preference are getting housing. The preferences need to be changed.

*Responses: HCDCH agrees that the current preferences need reviewing. The HCDCH staff is currently reviewing all preferences identified in the 2004 PHA Plan to determine the short and long term impact of each preference as it will affect current and future housing applicants, housing vacancy rates, HUD rules and standards, financial, and management issues. It is hoped that a determination can be made during the development phase of the FY 2005 PHA Annual Plan.*

Revise the sections regarding admission preferences to conform to HCDCH's Admissions and Continued Occupancy Policy by noting that “Date and Time” are not an admissions preference which is given second priority, but instead is the method used to choose among applicants on the waiting lists with equal preference status.

*Response: HCDCH agrees that there is confusing on the using of “Date and Time” as a preference. The “2” under the public housing and Section 8 preferences has been removed from the Date and Time in the PHA Plan.*

Although the plan indicates that applicants have three or more housing choices, this may not be the case for every applicant in Hilo. Some are given only one chance.

*Response: Without any specifics of the situation, it is difficult to determine what occurred. It is stated in HCDCH's Administrative Rules (§15-190-39) that an applicant shall be afforded three offers for a suitable unit. Upon refusal of the three offers without good cause, the applicant's name will be removed from all wait lists. All management units will be reminder of this requirement and told to ensure equal and fair application of the three offer requirement.*

HCDCH should ask for Section 8 vouchers and place those people into higher income housing projects.

*Response: HCDCH will continue to seek additional vouchers, when possible. However, rules preclude the use of any Section 8 vouchers within a federal public housing project.*

#### **Section 4: Rent Determination Policies**

To conform with the current HCDCH practice, the provisions on page 25 of the Annual Plan indicating that changes in income should be reported any time there is an interim rent adjustment should be removed and a check mark should be placed in the boxed labeled “Any time the family experiences an income increase.”

*Response: HCDCH agrees. “Any time the family experiences an income increase” box has been checked and the words, “Whenever the family is requesting an interim rent adjustment” has been added to the “At family option” box.*

In the plan it says that PHA may not employ any discretionary rent setting policies for income based rent in public housing. HCDCH should implement discretionary policies.

*Response: HCDCH agrees and has always employed discretionary rent setting policies and has checked the appropriate box to so indicate.*

#### **Section 6: Grievance Procedures**

Revise page 29 of the Annual Plan to clarify that HCDCH has established written grievance procedures in addition to federal requirements found at 24 CFR Part 966 Subpart B, for resident public housing.

*Response: Section 6 PHA Grievance Procedures A1 will be amended to reflect a "yes". Pursuant to 24 CFR 966, Subpart B, each PHA shall adopt a grievance procedure affording each tenant an opportunity for a hearing on a grievance. HCDCH Grievance Procedures are established in Hawaii Administrative Rules section 15-183.*

*Clarification to the federal requirements follows:*

- *Applicability - A reasonable time to initiate grievances relating to the rental agreement is within 30 days of such act or omission.*
- *Applicability - A reasonable time to initiate grievances relating to the rules is within 90 days of an act or omission based on the rule.*
- *Informal Settlement of Grievance - The written summary of the informal settlement meeting shall be prepared within 15 days.*
- *Informal Settlement of Grievance - The complainant shall submit a written request for a hearing to HCDCH within 30 after receipt of the written summary of the informal settlement meeting.*
- *Selection of Hearing Officer or Hearing Panel – Complainant and HCDCH shall jointly select a hearing officer, if that cannot be done, each shall appoint a member and those two shall select a third. If the third member cannot be agreed to, an independent arbitration organization or other third party shall select the third member.*

- *Scheduling of Hearing - A hearing shall be scheduled within 28 days after receipt of comments and recommendations of the project's tenant association regarding the appointment of a hearing officer or panel.*
- *Decision of the Hearing Officer or Hearing Panel – If the hearing officer or hearing panel upholds the corporation's action to terminate the tenancy of a complainant, HCDCH shall not commence the eviction action until it has served a written notice to vacate on the complainant. The notice to vacate shall not be issued prior to the decision of the hearing officer or hearing panel having been mailed or delivered to complainant.*

## **Section 7: Capital Improvement Needs**

A resident was not able to find any money identified for Nani Olu from 1999 to 2003. In addition, there are no funds identified for Nani Olu from 2005 to 2008. What is the nature of Capital Fund improvements and what is there that will take care of minor repairs. At Nani Olu the roof is leaking, guts that don't handle the water, private storage areas do not lock or close, and several loose railings, which may be safety problems. Are these Capital Fund Improvements, if so can they be repaired before 2010? How do resident know how much money has been earmarked for Nani Olu?

*Response: There were no funds identified for Nani Olu in 1999 to 2003. In the 5-Year Action Plan, no funds have been earmarked for any capital improvements such as rehabilitation or modernizations for Nani Olu. HCDCH must evaluate the capital improvement needs against the resources within the program. Currently and for the near future, the need for capital improvements at the seventy-plus federal housing projects managed by HCDCH far exceed the financial resources of the program. The shortfall in resources has required HCDCH to evaluate each need and prioritize the work that must be done. At this time, Nani Olu is not listed for any capital fund improvements for at least the next five years. However, HCDCH does constantly review and evaluate the capital funds needs of housing communities.*

*The maintenance issues mentioned are not classified as capital improvements so capital funds can not be used to repair the problems. However, the repairs are considered routine maintenance and operating funds must be used to correct the problems. The health and safety issues will be investigated immediately by unit management. The other routine repair issues will be addressed by the property management branch.*

*In the 2004 Capital Fund development process, input for the 5-Year Action Plan was gathered from federal housing project residents (resident survey), unit managers, and previous maintenance assessments, plans, and reports. From this information, the prioritization of capital fund resources was accomplished as previously mentioned. In the future, more interaction with the resident associations and the community in general will occur to ensure that housing communities are aware of capital fund implementation plans.*

For 2006 (\$2,138,653), 2007 (\$1,861,346) and 2008 (\$1,000,000), Ka Hale Kahaluu is identified in the Five Year Action Plan – Summary (Page 1), but the \$1,000,000 (2008) does not appear in the Supporting Pages – Work Activities (Page 5-21). Is the

\$1,000,000 identified for Ka Hale Kahaluu sufficient to do the repairs because there are many repairs that have to be done at Ka Hale Kahaluu? What about other housing projects that need repair such as mold in the elevators? When are they going to be considered for repairs and renovations to have adequate living standards? They are elderly and disabled and have should have a priority.

*Response: HCDCH has identified a total of \$5,000,000 for the modernization of Ka Hale Kahaluu with work being scheduled for 2006 (\$2.1 M) and 2007 (\$1.86 M). There are no funds allocated for 2008. The 5-Year Action Plan has been updated to indicate that funds will be used only in 2006 and 2007. The maintenance issues mentioned are not classified as capital improvements so capital funds can not be used to repair the problems. However, the repairs are considered routine maintenance and operating funds must be used to correct the problems. The health and safety issues will be investigated immediately by unit management. The other routine repair issues will be addressed by the property management branch. Having such a large housing inventory, HCDCH considers many factors when prioritizing the use of capital funds assets such as physical needs assessments; level, scope, and cost of the required repairs/replacement; impact on the housing community; age of the project; availability of funds; and resident and community input.*

## **Section 8: Demolition and Disposition**

This part of the plan states that HCDCH plans to apply for demolition of the total development. While this may be an opportunity to develop more appropriate family housing in a non-high-rise mix of units, this would create challenges for HCDCH. Some issues to be considered must be: how will HCDCH provide housing to the 614 families to be displaced? Will HCDCH create 614 or more new units, or will there be a net loss of affordable units? If there is a loss, how will HCDCH address the growing needs for additional housing units, while reducing the number of units at KPT? Lastly, and perhaps most important, will HCDCH make a commitment to serve the same population in the new housing as those who currently live at KPT, i.e. a high immigrant, ethnic minority population, most with very low incomes. If there is a change in the composition of tenants, what new options will be created to serve the needs of this population?

*Response: Concerning the displaced families, HCDCH will provide housing to all displaced tenants in good standing through other public housing units and through Section 8 vouchers. Relocation, demolition, and new construction would be phased over many years. On the question of replacement of the demolished KPT units, HUD does not require a one-for-one replacement. HCDCH would strive to replace the units with the construction of new affordable housing on-site (public housing and low income tax credit units), Section 8 vouchers, and construction or acquisition of additional units through the use of HUD's Replacement Housing Factor funding. The last one is dependent on funding decisions by HUD. Concerning the commitment to serve the same population, HCDCH will continue to be committed to giving the displaced families who remain in good standing the opportunity to return to the new units. HCDCH will continue to be committed to every resident when providing housing and supportive services in an equal and fair basis without regard to ethnicity, race, color, ancestry/national origin, age, familial status, physical or mental disability, marital status, sex, religion, or HIV infection.*

## **Section 11: Homeownership Programs Administered by the PHA**

HCDCH needs to establish an Individual Development Account Program for its residents.

*Response: Residents are eligible to participate in Individual Development Account Programs offered by several non-profit community-based agencies who work with local financial institutions in Hawaii. HCDCH continues to support efforts by residents to participate in these programs.*

## **Section 12: Community Service Programs**

To seek out additional resources and collaborative partnerships and dedicating these resources to provide HCDCH low income public housing residents, especially the children, youth, and younger adults, the economic opportunities, incentives and motivation through proven effective job training programs and real career opportunities under Section 3, needed to help these residents to better themselves to become healthy, responsible, and productive adults with the renewed hope of transitioning out of housing assistance.

*Response: HCDCH will continue to pursue resources such as the Resident Opportunities for Self Sufficiency grants provided by HUD to provide educational programs, job training, and other supportive services to improve economic self-sufficiency opportunities to public housing residents. In addition, HCDCH will continue to develop and utilize the Section 3 program for the benefit of public housing residents.*

Lanakila Homes does not have any self-sufficiency programs and would like to have several to promote self- sufficiency.

*Response: HCDCH will continue to support self-sufficiency programs across all public housing projects within our funding resources. HCDCH, in cooperation with Hilo resident leaders, will seek out community partners in promoting self-sufficiency.*

## **Section 13: Crime and Safety**

To continue funding and seek out additional funding to provide and expand services to create and maintain safer communities for HCDCH residents and safer workplace for HCDCH employees such as continued funding for paid security services with a licensed vendor, closely monitored to ensure good performance, at the larger, high density housing developments like Kalihi Valley Homes.

*Response: HCDCH will continue to work with the Honolulu Police Department to develop and implement strategies to maintain safe communities. Having limited funding resources, HCDCH will continue to evaluate and prioritize the use of its funds. It is hoped that funding for paid security services can be continued. However, these services continue to be predicted on the availability funding resources and agency prioritization.*

With the elimination of the PHDEP funds, how will HCDCH support the same type of drug elimination programs?

*Responses: Even though the PHDEP program is no longer being funded, HCDCH will continue to support drug prevention programs and the voluntary tenant patrols within the funding resources in the Operating Subsidy. HCDCH is also committed to continue collaboration with the voluntary tenant patrols and the Police Departments to support tenant patrols with training and walks.*

Residents at Lanakila Homes want to be placed on the list as projects being most affected by crime and drugs and needing safety improvements.

*Response: Those projects selected were those that had sufficient data on incidences of violent and/or drug-related crime. Lanakila Homes did not have sufficient data available on crime and drugs. HCDCH will continue to work with the Hawaii Police Department on obtaining the data needed to measure the safety of public housing residents in the Hilo area.*

## **Section 18: Other Information**

It shows in the plan that the resident on the PHA Board is not elected. How is the resident selected?

*Response: In accordance with HCDCH's Administrative Rule §15-181-62, the Resident Advisory Board shall submit to HCDCH a list of five nominees for the public resident member of the Board of Directors. The Governor shall select and appoint one of the nominees as the public resident Board member from the list of five nominees. The Governor's selection is then submitted to the State Senate for their confirmation.*

## **Attachment E: Community Service Requirement**

HCDCH should not monitor its own program to implement the Community Service Requirement mandated by HUD. It should a third party because there is a conflict of interest. HUD recommends that, but the choice is up to HCDCH.

*Response: HCDCH is exploring the option of contracting a third party to assist in the continued implementation the Community Service Requirement, subject to the availability of funds and capacity of community organizations or service providers to manage a statewide program. HCDCH is also exploring ways to create linkages between volunteer and employment opportunities for those residents required to perform eight hours of community service.*

Revise the current Community Service Policy to clarify and expand the policy.

*Response: HCDCH is currently finalizing its detail management unit instructions on the implementation of the community service requirement and will incorporate any appropriate recommended changes that were attached in the provided written comments into the instructions. Attachment E is intended as only a summary of the HCDCH's Community Service Requirement policy and procedures as outlined in HUD's Public Housing Agency (PHA) Plan Desk Guide.*

There needs to be clear guidelines on self-employment. In addition, residents should be told how they can meet the employment qualification when they are self-employed.

*Response: The guidelines established for self-employment states that individuals self-employed must show a minimum of 30 hours of employment. There are several requirements that must be met to verify self-employment, i.e., signed certificate attesting to self-employment for a minimum of 30 hours, a business license, or income tax forms. The project management will verify the information before the exclusion from the Community Service Requirement is allowed. As stated above, HCDCH is finalizing its internal implementation instructions and will ensure that self-employment is covered in detail.*

## **Attachment F: Pet Policy**

Specific inoculations such as parvovirus, distemper, hepatitis, etc listed when some are not listed on the Pet Health Report should be taken out of the Pet Policy.

*Response: HCDCH agrees that referencing specific types of inoculations and diseases should be eliminated. The specific references to any specific type of disease has been deleted and a statement added that now refers to inoculations and boosters “required by state and county laws and regulations” must be provided.*

Current pet policy appears to be in conflict with the pet policy for the elderly and disabled and case law. The elderly and disabled pet policy is not even available for review by residents.

*Response: There is current only one policy for pets in federal public housing. The policy applies to non-elderly residents as well as elderly residents. The initial policy was submitted and approved in 2002 to HUD. The current pet policy, Administrative Rule §15-190-91, and Admissions and Continued Occupancy Policy all exclude animals that assist, support, or provide services to persons with disabilities from the pet rules.*

The pet deposit of \$75.00 is too much to ask for from the elderly. \$35.00 is a more reasonable amount. In addition, tenants are charged \$5.00 (non-refundable) per month. It is a hardship for low income people and is unreasonable.

*Response: For future PHA Plans, HCDCH will seek feedback from the RAB and housing project resident associations concerning the amount of the refundable deposit. Concerning the \$5.00 monthly fee, the response from residents is varied. Many residents surveyed felt that the charge is reasonable for pet owners. Non-pet owners believe that the additional maintenance costs such as general pet area clean up and fumigation should be placed on the pet owners and not from the general maintenance funds used to maintain the entire project. Many pet owners agree that the cost is minimal and the use of the funds to ensure a healthy environment for their pets is reasonable. HCDCH will continue to gather feedback on the costs related to pet ownership and make any necessary adjustments in future Annual Plans that are fair and equal for all resident pet owners.*



The current policy puts residents who want a pet at a disadvantage because they must find temporary shelter for a pet before they can legally have a pet in their unit. HCDCH should give 30 day grace period to have a pet while they get the necessary paperwork.

*Response: HCDCH will gather feedback on the possible implementation of a “pre-licensing grace period” from the RAB, unit managers, and federal public housing resident associations and will make any needed adjustments to future Annual Plans and the Pet Policy.*

#### **Attachment H: Resident Advisory Board Membership**

The listing is outdated because the current member for Kona is not listed.

*Response: HCDCH agrees and Attachment H to the PHA Plan has been updated to reflect the current RAB members.*